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March 6, 2025

VIA ECF

Honorable Jessica S. Allen
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: In re: Fragrance Direct Purchaser Antitrust Litigation
Civil Action No. 23-02174(WJM)(JSA)
In re: Fragrance Indirect Purchaser Antitrust Litigation
Civil Action No. 23-03249(WJM)(JSA)
In re: Fragrance End-User Plaintiff Antitrust Litigation
Civil Action No. 23-16127(WJM)(JSA)**

**Joint Request for Extension of Time to Respond to the Complaints
and to Submit Proposed Scheduling Order**

Dear Judge Allen:

We write on behalf of, and with the consent of, all defendants and plaintiffs in the above-captioned actions (the "Actions") to seek an extension of time from **March 7, 2025** to **March 14, 2025** for the filing of:

1. Defendants' responses to the surviving claims in the plaintiffs' complaints; and
2. A proposed scheduling order by the parties.

On February 21, 2025, the District Court issued an Order and Opinions in response to Defendants' Motions to Dismiss. (*See* ECF Nos. 185-87 in No. 23-02174; ECF Nos. 136-38 in No. 23-03249; ECF Nos. 119-20, 122 in No. 23-16127.) The Order states that the parties shall file a proposed scheduling order concerning (1) the filing of amended complaints, (2) the filing, if appropriate, of any motion(s) to dismiss the amended complaints, and (3) jurisdictional discovery by March 7, 2025. (*See* ECF 186 at 2 in No. 23-02174.) The parties are having

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discussions in this regard and are hopeful that with an additional week they will be able to agree on a joint scheduling order.

The Order also grants Indirect Purchaser Plaintiffs and End-User Plaintiffs leave to amend their consolidated complaints with respect to the claims dismissed for failure to state a claim pursuant to Rule 12(b)(6) by March 24, 2025. *Id.* Per Federal Rule of Civil Procedure 12(a)(4)(A), however, defendants' answers to the surviving claims in these complaints and to the Direct Purchaser Plaintiffs' complaint must be filed by March 7, 2025, absent an extension. *Id.*

If this joint extension request meets with the District Court's approval, kindly "So Order" this letter and return it to the parties via the District Court's ECF system.

We thank Your Honor for your consideration of this request, and we are available to answer any questions at the District Court's convenience.

Respectfully submitted,



Sean P. McConnell

SPM

cc: All Counsel of Record (via ECF)

***SO ORDERED.**

Date: March 7, 2025

/s/ Jessica S. Allen
Hon. Jessica S. Allen, U.S.M.J.